

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and
STEINER ASSOCIATES, LLC,

Plaintiffs,

V.

EBAY INC., et al.,

Defendants.

Civil Action No. 21-CV-11181-PBS

**JOINT MOTION FOR ENTRY OF SCHEDULING ORDER
AND EXTENSION OF TIME TO FILE PROTECTIVE ORDER**

Plaintiffs Ina Steiner, David Steiner, and Steiner Associates, LLC and Defendants eBay Inc. (“eBay”), Progressive F.O.R.C.E. Concepts, LLC (“PFC”), Devin Wenig, Steve Wymer, Jim Baugh, David Harville, Brian Gilbert, Philip Cooke, Stephanie Popp, Stephanie Stockwell, Veronica Zea, Wendy Jones, and Steve Krystek (the “Parties”) file this Joint Motion for Entry of Scheduling Order and Extension of Time to File Protective Order (the “Motion”). In support of this Motion, the Parties state as follows:

1. On September 27, 2023, the Parties submitted a proposed scheduling order with various disputed issues. *See* Dkt. No. 270.
2. On September 28, 2023, the Court issued an order resolving the disputed issues and directed the Parties to submit a scheduling order and protective order by October 16, 2023. *See* Dkt. No. 271.
3. The Parties have conferred and reached agreement on a joint scheduling order, attached here at Exhibit A.
4. The Parties have exchanged drafts of a proposed protective order, but are still

diligently working to narrow and hopefully resolve disputes concerning the protective order.

5. A short extension would allow the numerous parties in this case to attempt to resolve the outstanding issues with respect to a protective order.

WHEREFORE, the Parties respectfully request that the Court enter the Parties' proposed scheduling order, attached hereto as Exhibit A, and that the Court grant an extension of time by which the Parties must file a joint protective order up to and including October 18, 2023.

Dated: October 16, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2023, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants. An email copy was sent to pro se defendant Stephanie Stockwell.

Dated: October 16, 2023

/s/ Jack W. Pirozzolo

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